

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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JOHN K. MACIVER INSTITUTE  
FOR PUBLIC POLICY and  
WILLIAM OSMULSKI,

Plaintiffs,

v.

TONY EVERS, in his official  
capacity as Governor of the State of  
Wisconsin,

Defendant.

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No. 3:19-cv-00649-SLC

**AFFIDAVIT OF WILLIAM (BILL) OSMULSKI**

1. I am the news director for the MacIver Institute. I am a member of the Society of Professional Journalists, Madison Chapter.
2. I previously worked in television news in Milwaukee (2002-2005, CBS-58, sports editor), Eau Claire (2005-2008, ABC-18, general assignment reporter), and Madison (2008-2009, ABC-27, Rock County bureau chief).
3. While a television news reporter, I won Wisconsin Broadcasters Association awards in 2004 (first place for sports reporting, major market television) and in 2008 (second place for hard news/investigative reporting, small market television). While at the MacIver Institute, I was part of the team that won

Bronze in the Milwaukee Press Club's excellence in journalism awards for "Best Long Hard Feature Story" (2018).

4. I currently produce a weekly public-affairs program for WVCY-TV 30 in Milwaukee.
5. When Governor Evers took office, I asked the Governor's press staff to include myself and my MacIver News Service colleagues on any distributions lists they maintained for the news media. I never received any media advisories in response to this request.
6. When the Governor's Office held a press briefing on February 28, 2019, in advance of the Governor's budget announcement, I did not receive prior notification of the briefing from the Governor's press staff.
7. MacIver did hear about it from other members of the press corps, and pursuant to our colleagues' suggestion, myself and Matt Kittle, then our investigative reporter, emailed the Governor's press office to RSVP for the briefing. We received no response to our RSVP.
8. When we went to the Governor's Office suite where the briefing was to be held, we were stopped by staff and told we were not on the RSVP list.
9. When we asked whom we could speak to in order to be included, we were told that Melissa Baldauff, the Governor's communications director, was the

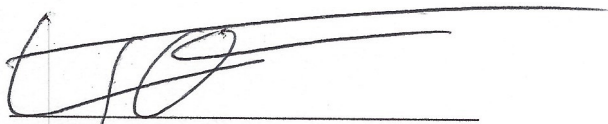
responsible staff person but that she was not available at that time, and that we should follow up with her directly for access to future briefings

10. We were not permitted into the February 28, 2019, budget briefing.

11. We subsequently contacted Baldauff but never received a response.

12. I have never been ejected from a press conference with Governor Evers or any other public official, and I am not aware of any of my MacIver colleagues who have ever been ejected from a press conference for being rude or disrespectful.

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on August \_\_\_\_, 2019.

  
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William (Bill) Osmulski, Affiant